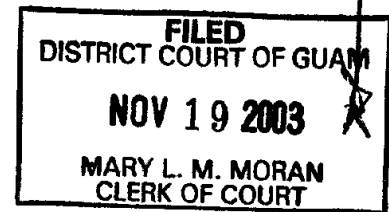


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Attorneys for Defendant The Hongkong and Shanghai Banking Corporation Ltd.

IN THE DISTRICT COURT OF GUAM

ALAN SADHWANI, LAJU
SADHWANI, and K. SADHWANI'S
INC., a Guam corporation,

Plaintiffs,

v.

HONGKONG AND SHANGHAI
BANKING CORPORATION, LTD.,
et al.,

Defendants.

CIVIL CASE NO. 03-00036

**NOTICE OF EX PARTE
APPLICATION AND
EX PARTE APPLICATION
FOR ORDER GRANTING
LEAVE TO HSBC TO EXCEED
PAGE LIMITS IN
MEMORANDA**

TO: PLAINTIFFS, and their attorneys, Arriola Cowan & Arriola

NOTICE IS HEREBY GIVEN that on November _____, 2003, at the hour
of _____m., Defendant The Hongkong and Shanghai Banking Corporation Limited
("HSBC") will bring the following Ex Parte Application before the Court.

Concurrently with this Ex Parte Application, HSBC has filed a Motion For Order
Granting Leave to HSBC to Exceed Page Limits in Memoranda ("Motion"). It is
important and urgent that the Motion be heard as soon as possible because HSBC is
preparing a motion to dismiss most, if not all, of the causes of action contained in the

ORIGINAL

Complaint for Damages ("Complaint") herein. As more fully described in the Motion, the length of the Complaint and the breadth and complexity of the issues raised therein constitute extraordinary and compelling reasons supporting HSBC's request for leave to exceed the page limitations imposed by Local Rule 7.1(g) for its memoranda supporting the motion to dismiss. HSBC has requested that counsel for Plaintiffs stipulate to the request for leave to exceed the page limits, but the request was refused without explanation. Accordingly, HSBC has no other alternative than to apply to this Court for relief.

This Ex Parte Application is supported by the pleadings previously filed in this case and by the record before this Court. Further grounds are also set forth in the Motion filed concurrently herewith, the Memorandum of Points and Authorities in support of said Motion, and the documents on file herein all being incorporated herein by this reference. This Ex Parte Application is further supported by the Declaration of Jacques A. Bronze concurrently filed herewith.

Dated this 22 day of November, 2003.

LAW OFFICES OF BRONZE & TANG, P.C.
Attorneys for Defendant The Hongkong and
Shanghai Banking Corporation Ltd.

By: _____

JACQUES A. BRONZE